

The Honorable John H. Chun
United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Bianey GARCIA PEREZ, Maria
MARTINEZ CASTRO, J.M.Z., Alexander
MARTINEZ HERNANDEZ, on behalf of
themselves as individuals and on behalf of
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES; Ur JADDOU, Director, U.S.
Citizenship and Immigration Services;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; David NEAL,
Director, Executive Office for Immigration
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &
STIPULATION**

Note on Calendar: April 14, 2023

PARTIES' JOINT STATUS REPORT AND STIPULATION

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services; Ur Jaddou, Director, U.S. Citizenship and Immigration Services; Executive Office for Immigration Review; and David L. Neal, Director, Executive Office for Immigration Review, hereby stipulate to an additional 30-day stay of proceedings as the parties continue their settlement discussions.

Plaintiffs and Defendants have previously jointly stipulated to several stays. On June 27, 2022, this Court issued an order granting the 60-day stay and ordering the parties to submit a joint status report on August 29, 2022. Plaintiffs and Defendants then held a settlement conference on August 3, 2022, where they discussed the claims for the putative classes and agreed that there was potential for resolving many, if not all of the claims without further litigation. Defendants requested Plaintiffs follow up with a written framework providing general parameters for resolving the claims. Plaintiffs submitted a document with a proposed settlement framework to Defendants on August 12, 2022.

On August 29, 2022, the parties submitted a joint status report and stipulation detailing their ongoing efforts to reach settlement in this case and requested a 90-day stay to further engage in settlement discussions and conserve judicial resources, as well as those of the parties. On August 30, 2022, this Court issued an order granting the 90-day stay and ordering the parties to submit a joint status report on November 28, 2022.

On October 14, 2022, Defendants provided written responses to Plaintiffs' proposed settlement framework. On October 26, 2022, the parties held a settlement conference where they discussed Defendants' responses, potential terms for settlement, and the possibility of resolving this matter without further litigation. On November 23, 2022, Defendants also requested that Plaintiffs provide written feedback to Defendants' October 26, 2022, settlement responses. Plaintiffs provided their written feedback on November 29, 2022.

1 On November 28, 2022, the parties filed a third stipulated motion to stay this case,
2 requesting an additional stay of 75 days. The Court issued an order granting the 75-day stay and
3 ordered the parties to submit a joint status report on February 13, 2023.

4 Subsequently, on February 6, 2023, Defendants responded to Plaintiffs with further
5 proposals on how to resolve the remaining disputes between the parties. The parties then held a
6 settlement conference on February 7, 2023, where they discussed the settlement framework and
7 the disputed matters. On February 13, 2023, the parties filed a fourth stipulated motion to stay this
8 case, and this Court issued an order granting a 60-day stay and ordered the parties to submit a joint
9 status report on April 14, 2023.

10 Since the February 7, 2023, conference, Defendants have been working to provide
11 additional responses to Plaintiffs regarding the remaining disputed matters between the parties.
12 The parties have met and conferred regarding the timeline for Defendants' responses. As a result
13 of those discussions, Defendants have agreed to provide their responses to Plaintiffs by May 5,
14 2023.

15 In light of these developments in the settlement discussions, the parties have agreed to
16 stipulate to a 30-day extension. Good cause exists for the stipulation because the complexity of the
17 issues in this case requires additional time and there continues to be a meaningful opportunity to
18 reach a settlement that would conserve judicial resources, as well as those of the Parties.

19 The parties respectfully request an order from the Court further staying Defendants'
20 responsive deadlines and setting a deadline for a joint status report for May 15, 2023. At that time,
21 the parties will provide the Court with an update on the status of settlement talks and, if applicable,
22 any proposed deadlines.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 14th day of April, 2023.

For the Plaintiffs:

/s/ Matt Adams

Matt Adams

/s/ Aaron Korthuis

Aaron Korthuis

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/s/ Mary Kenney

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 14th day of April.



The Honorable John H. Chun
UNITED STATES DISTRICT JUDGE